



"City of Champions"

**DEPARTMENT OF PUBLIC WORKS
OFFICE OF THE COMMISSIONER**

Michael L. Thoreson
COMMISSIONER

July 21, 2010

CERTIFIED MAIL 7002 2410 0001 8493 8728

I. Andrew Goldberg
Assistant Attorney General
Massachusetts Office of the Attorney General
One Ashburton Place
18th Floor
Boston, MA 02108

**Subject: Brockton, Massachusetts
Wastewater Collection/Treatment Facility
Consent Decree Civil Action Case No. 1:06-cv-11334-NMG
2010 - 2nd Quarter Report**

Dear Mr. Goldberg:

The following is a quarterly report for your consideration regarding the City's Consent Decree Civil Action referenced above. This information is an update of the individual ongoing wastewater projects within the City plus other relevant data, in accordance with Section 42 of the Consent Decree.

Section 42 a - Activities Directed at Compliance with the Consent Decree:

1. Miscellaneous Sewer Pipe Repair and Replacement

The City has been performing sewer rehabilitation based on the findings of the City Wide Sewer System Evaluation Survey (SSES). In addition, there are several private contractors performing sewer rehabilitation throughout the City. As a result of this work, many gallons of extraneous flow have been removed from the sewer system. The attached Table 1 is a summary of sewer system repairs documented since 1990. The City and private contractors repaired numerous defects identified in the SSES during the 2nd quarter of 2010 and removed several sources of inflow, which account for removal of 628,388 gpd of extraneous flow. This activity is required by Sections 35 through 39 of the Consent Decree.

2. Phase VIII Sewer System Rehabilitation

Construction continued during this quarter. The construction value is approximately \$1,000,000 and SRF assistance is being provided. This activity is required by Sections 35 through 39 of the Consent Decree.

3. Phase IX Sewer System Rehabilitation

Construction continued during this quarter. The construction value is approximately \$2,300,000 and SRF assistance is being provided. This activity is required by Sections 35 through 39 of the Consent Decree.

4. Local and State Funding

The City is proceeding with the SRF funding package totaling \$99.725 million, which matches the City authorization for bonding to cover the final phases of rehabilitation. These funds are required for the upgrade of the wastewater treatment facility and for rehabilitation of the collection system.

5. I/I Reduction by Whitman and Abington

Both Whitman and Abington are required to develop an I/I rehabilitation plan as defined in the new NPDES permit for the Brockton WWTF. Both have been provided a copy of the Consent Decree and are currently pursuing I/I studies and rehabilitation. This activity is required by Section 40 of the Consent Decree.

6. Private Inflow Reduction Program

The City has completed the house-to-house inspection program. This activity is required by Sections 35 through 39 of the Consent Decree.

7. Wastewater Treatment Facility Upgrade

All three Phases of the WWTF Upgrade have reached substantial completion. These activities are required by Section 23, 24 and 25 of the Consent Decree.

Section 42 b - Plans, Reports, and Deliverables Completed and Submitted during this Period:

1. Receiving Water Assessment SEP - Scope of Work

The revised/final scope of work for the Comprehensive Receiving Water Assessment SEP was submitted during this period (see attached) in accordance with Appendix A of the Consent Decree.

2. Lead Analysis SEP - Completion Report

The Lead Analysis SEP completion Report was submitted during this period (see attached) in accordance with Appendix C and Section 15 of the Consent Decree.

Section 42 c - Activities Anticipated During the Next Reporting Period:

1. The City will submit a quarterly report.
2. Miscellaneous Sewer Pipe Repair and Replacement by City Personnel

Additional sewer rehabilitation by City staff based on the findings of the City Wide Sewer System Evaluation Survey (SSES) is expected to continue during the next reporting period.

3. Phase VIII Sewer System Rehabilitation Design

Construction of this project will continue during the next reporting period.

4. Phase IX Sewer System Rehabilitation Design

Construction of this project will continue during the next reporting period.

5. Wastewater Treatment Facility Upgrade

Compliance with the NPDES permit is expected to continue during the next reporting period, as required in Section 34 of the Consent Decree.

6. Supplemental Environmental Projects

It is expected that work on the receiving water assessment SEP will commence during the next quarter.

Section 42 d - Anticipated Non-Compliance During the Next Reporting Period:

During the next quarter, it is expected based on the fact that Brockton has reached significant completion with all Phases of the upgrades; that the treatment facility should continue to be without effluent violations (SNC) of its NPDES permit.

Section 42 e - Non-Compliance during the Current Reporting Period:

During the 2nd quarter of 2010, the City of Brockton WWTF experienced no effluent violations in May or June but due to the record rainfall in March of 17.8" there was a violation reported in April on the 1st which was a result of flows in excess of 60MGD with an actual peak of over 65MGD. The UV System has a peak capacity of 60MGD.

April

1 - Daily Fecal Coliform on 4/1 Result = 1960/100mL Permit 400/100mL

May
NONE

June
NONE

Section 14 - Status of Supplemental Environmental Projects:

1. Receiving Water Assessment SEP (Consent Decree Appendix A)

The City has submitted the final scope-of-work for the SEP in compliance with the requirements of the Consent Decree. A QAPP will be submitted for approval, and the first round of field sampling is expected to occur during the next quarter in order to meet the deadlines of the SEP.

2. Regional Wastewater Management Planning SEP (Appendix B)

In compliance with the requirements of the Consent Decree, the City has disbursed the required funds in the amount of \$75,000 to the Old Colony Planning Council for implementation of the scope-of-work for this SEP.

3. Lead Analysis SEP (Appendix C)

The City has completed all testing of all open schools per the approved scope-of-work for the lead sampling SEP. During the testing program, the City opened two new large schools and closed some schools that had a small number of samples. The sites that have had positive reconfirmed tests are been shut off to public use by the School Department. An exception to this is the greatest number of sinks found in many science labs, where clear signs and teacher notification will prohibit consumption. The SEP completion report has been submitted. The City has expended approximately \$27,000 to date for this SEP (supporting cost documentation previously provided.)

Section 73 - Certification by representative of the City

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Closing

We trust this information meets your expectations regarding the required progress report. Please do not hesitate to contact me at 508-580-7135 regarding any questions or comments on this information.

Sincerely,



Michael L. Thoreson
DPW Commissioner

MLT/ss

cc: Chief, Environmental Enforcement Section CERTIFIED MAIL 7002 2410 0001 8493 8735
Environmental and Natural Resources Division
United States Department of Justice
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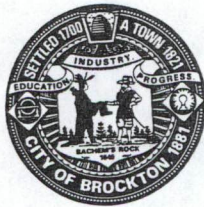
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Joseph Shepherd, MADEP, SER
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J. Condon, Chief Financial Officer
David Norton, Water and Sewer Contract Administrator
Lawrence Rowley, Utilities Superintendent
Gregory Roy, CDM Cambridge
Ian Mead, CDM Providence



"City of Champions"

**DEPARTMENT OF PUBLIC WORKS
OFFICE OF THE COMMISSIONER**

Michael L. Thoreson
COMMISSIONER

CERTIFIED MAIL
7008 1140 0001 9794 4847

July 12, 2010

I. Andrew Goldberg, Assistant Attorney General
Massachusetts Office of the Attorney General
One Ashburton Place -18th Floor
Boston, MA 02108

Subject: Brockton, Massachusetts
Consent Decree Civil Action Case No. 1:06-cv-11334-NMG
FY11 Sewer Enterprise Fund

Dear Assistant Attorney General Goldberg:

The City of Brockton submits the following FY11 Sewer Enterprise Fund as required by the Consent Decree (CD) identified above. This correspondence is intended to fulfill the requirement of Section 41 in the Consent Decree.

All maintenance activities related to the wastewater collection system and treatment facility are summarized in the quarterly reports. The City acknowledges that revenues collected are sufficient to support the proper operation and maintenance of the City's wastewater collection system and treatment facility.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please do not hesitate to contact me at 508-580-7135 if you would like to discuss this plan.

Sincerely,


Michael L. Thoreson
DPW Commissioner

MLT/ec

I. Andrew Goldberg, Assistant Attorney General
July 12, 2010

xc: Chief, Environmental Enforcement Section Certified Mail 7008 1140 0001 9794 4526
Barbara Healy Smith, Assistant U.S. Attorney Certified Mail 7008 1140 0001 9794 4861
Tonia Bandrowicz, Sr. Enforcement Counsel Certified Mail 7008 1140 0001 9794 4854
✓ Joy Hilton, Environmental Engineer Certified Mail 7008 1140 0001 9794 4878
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Larry Rowley, Utilities Superintendent
David Norton, Water & Sewer Contract Administrator
Elaine Czaja, Administrative Assistant, Brockton DPW
Gregory Roy, CDM
Ian Mead, CDM

DEPARTMENT OF PUBLIC WORKS
SEWER UTILITIES DIVISION
ENTERPRISE FUND SYSTEM

MISSION STATEMENT

The Department's mission is to maintain all sewer lines throughout the City. To perform 24 hour emergency services to the residents of Brockton should they have sewerage backing up into their homes or property. To perform preventive maintenance work on all sewer connections and replace old sewer lines. Install new sewer services. Mark out sewer services for all utility companies and contractors. Inspect all new additions to houses or businesses to ensure existing sewer services are not disturbed.

SERVICE ACTIVITIES

Install new sewer lines and repair connections.

Perform dye tests.

Inspect all sewer connections.

Performs any other duties necessary to insure public safety.

FY 2011 Budget

City of Brockton

			2009 Actual Expenditures	2010 Revised Budget	2011 Department Requested	2011 Mayor Recommended	2011 City Council
All figures in full dollar amounts							
<u>Sewer Personnel Services Ove</u>							
60044173	514100	OVERTIME	120,599	160,000	160,000	158,349	0
Sewer Personnel Services Ove Total:			120,599	160,000	160,000	158,349	0
<u>Sewer Personnel Services Non</u>							
60044174	511100	FULL TIME	817,485	1,013,205	1,015,131	951,045	0
60044174	511900	STIPEND	287	-49	700	703	0
60044174	513900	CLERCL INC	3,400	5,580	5,180	4,550	0
60044174	513902	SIGN'G BON	0	0	0	0	0
60044174	514000	LONGEVITY	4,340	6,764	7,124	6,870	0
60044174	514100	OVERTIME	1,567	781	0	0	0
60044174	514200	SHIFT DIFF	21,675	34,000	34,000	34,000	0
60044174	514300	HOLIDAY	0	2,125	1,170	393	0
60044174	514400	ED. INCENT	15	2,034	3,090	1,539	0
60044174	514700	ON CALL	21,679	59,575	16,512	16,512	0
60044174	515000	OUT OF GRD	3,433	4,700	4,700	4,700	0
60044174	515200	HAZRD DUTY	0	18,090	19,523	19,523	0
60044174	515300	SEP. COST	0	59,354	45,088	45,088	0
60044174	515600	VAC BUY BK	0	0	1,832	0	0
60044174	517000	WORK. COMP	128,305	100,501	108,301	96,210	0
60044174	519100	UNSD SICK	764	0	2,100	0	0
60044174	519200	CLOTH ALLW	31,167	37,400	37,400	37,400	0
60044174	519400	EMP LIC&RG	575	800	0	0	0
60044174	519500	TUITN&TRNG	150	1,400	1,600	0	0
60044174	519600	CDL STIPEN	0	10,858	8,039	8,039	0
Sewer Personnel Services Non Total:			1,034,840	1,357,118	1,311,490	1,226,572	0
<u>Sewer Purchase of Service</u>							
60044175	521100	ELECTRICTY	1,720,264	1,850,000	1,850,000	1,850,000	0
60044175	521200	ENERGY	-5,478	24,500	24,500	20,500	0
60044175	521501	SW&WT CHRG	2	700	700	700	0
60044175	524100	BLD/GRD RP	13,845	15,000	15,000	15,000	0
60044175	524200	VEH REP/MT	6,295	13,225	8,225	8,225	0
60044175	524300	DPT EQ REP	-2,626	4,500	4,500	4,500	0
60044175	524500	DP EQ REPR	-1,643	4,000	4,000	4,000	0
60044175	527300	DPT EQ R/L	601	5,620	5,620	5,620	0
60044175	529100	SEC/FIR CL	360	400	400	400	0
60044175	529400	PROP SERVC	39,196	91,000	71,000	71,000	0
60044175	529409	CNTRT EMER	0	0	0	0	0
60044175	529410	PLT R&M K	0	0	0	0	0

FY 201_ Budget

City of Brockton

			2009	2010	2011	2011	2011
			Actual	Revised	Department	Mayor	City
All figures in full dollar amounts			Expenditures	Budget	Requested	Recommended	Council
<u>Sewer Purchase of Service</u>							
60044175	529801	CONDEC/RVR	0	0	0	0	0
60044175	530300	MEDICAL	0	1,500	1,500	1,500	0
60044175	530500	ENGINEERING	-2,945	125,000	125,000	125,000	0
60044175	530900	CONSULTANT	50,431	178,000	215,000	200,000	0
60044175	531200	PUB. SAFTY	4,497	30,000	20,000	20,000	0
60044175	534100	POSTAGE	25	12,350	12,350	5,000	0
60044175	534200	TELEPHONE	0	3,600	3,600	2,000	0
60044175	534300	ADVERTISING	1,154	3,350	1,350	1,350	0
60044175	534400	COMM SERV	1,451	5,090	5,090	5,090	0
60044175	538100	MICROFILM	0	400	400	400	0
60044175	538600	PRINTING	0	3,100	3,100	3,100	0
60044175	538700	LAB TESTIN	0	80,000	80,000	80,000	0
60044175	538800	VET SERVCS	-12,940	0	0	0	0
60044175	539001	GASB 34	0	0	0	0	0
Sewer Purchase of Service			Total:	2,451,335	2,451,335	2,423,385	0
<u>Sewer Goods &Supplies</u>							
60044176	542100	COPIER SUP	396	420	420	420	0
60044176	542200	REF MATERL	582	600	600	600	0
60044176	542400	OFFC SUPPL	1,396	1,450	1,450	1,450	0
60044176	542600	DP SOFT&SP	773	800	800	800	0
60044176	543200	ELECT SUPP	984	1,000	1,000	1,000	0
60044176	543500	TOOLS&HDWE	6,434	6,750	6,750	6,750	0
60044176	545300	JANIT SUP	11,059	11,250	11,250	11,250	0
60044176	546100	LANDSCAPIN	0	0	0	0	0
60044176	548100	GASOLINE	28,940	30,000	30,000	30,000	0
60044176	548200	TIRES	790	1,000	1,000	1,000	0
60044176	548400	PRTS/ACSRS	27,575	25,000	20,000	20,000	0
60044176	553500	PIPES & FI	47,591	80,396	83,396	70,000	0
60044176	553701	CHEMICALS	28,318	35,000	35,000	35,000	0
60044176	558000	PUR CLOTHG	4,573	7,600	4,600	4,600	0
60044176	571100	IN ST TRVL	154	250	250	250	0
60044176	573100	REG/MEM/SB	230	625	625	625	0
60044176	573200	TUIT/TRNIG	0	0	0	1,600	0
60044176	573300	LIC®	0	0	600	600	0
60044176	578400	REG DEDS F	77	600	600	600	0
60044176	585001	DPT EQUIP	29,536	30,654	30,654	30,654	0
60044176	585002	COMM EQUIP	280	2,817	7,817	5,000	0

FY 201 Budget

City of Brockton

All figures in full dollar amounts			2009 Actual Expenditures	2010 Revised Budget	2011 Department Requested	2011 Mayor Recommended	2011 City Council
Sewer Goods &Supplies							
Total:			189,688	236,212	236,812	222,199	0
<u>Sewer Capital Projects</u>							
60044182	589000	CAPTL PROJ	0	0	0	0	0
60044182	589016	LIFT STATN	0	0	0	0	0
60044182	589017	PHASE IV	0	0	0	0	0
60044182	589018	EAST SWR R	0	0	0	0	0
60044182	589019	SCADA	0	0	0	0	0
Sewer Capital Projects	Total:		0	0	0	0	0
<u>Sewer Debt Service</u>							
60044183	590000	PRINCIPAL	3,955,590	4,306,241	0	4,817,609	0
60044183	591500	INTEREST O	1,716,677	2,278,249	0	440,032	0
60044183	593000	INT ST NOT	10,138	0	0	25,000	0
60044183	595400	ISSUANCE C	153,428	175,000	0	220,861	0
Sewer Debt Service	Total:		5,835,834	6,759,490	0	5,503,502	0
<u>Sewer Expense Reimbursement</u>							
60044184	597001	EXPREIM GF	1,176,138	1,471,926	0	1,851,413	0
Sewer Expense Reimbursement	Total:		1,176,138	1,471,926	0	1,851,413	0
<u>Sewer Debt Service from R/E</u>							
60044185	591500	INTEREST O	0	0	0	0	0
60044185	591501	PRTL PYMT	491,822	0	0	1,852,114	0
Sewer Debt Service from R/E	Total:		491,822	0	0	1,852,114	0
<u>Consent Decree Penalties</u>							
60044186	529800	EPA/DEP MD	0	0	0	0	0
Consent Decree Penalties	Total:		0	0	0	0	0
<u>O.M. Emer Contract Repair</u>							
60044187	529409	CNTRT EMER	-510,794	200,000	200,000	200,000	0
O.M. Emer Contract Repair	Total:		-510,794	200,000	200,000	200,000	0
<u>Sewer-Other Contract Servic</u>							
60044188	531700	O CTRCT SV	3,182,960	3,365,240	3,326,006	3,326,006	0
Sewer-Other Contract Servic	Total:		3,182,960	3,365,240	3,326,006	3,326,006	0
<u>US Fil-Wastewater/Filtra Sur</u>							
60044189	531800	WASTW FILT	192,347	222,779	225,262	225,262	0
US Fil-Wastewater/Filtra Sur	Total:		192,347	222,779	225,262	225,262	0
<u>Sewer USFContract F.&P. R&M</u>							

FY 2011 Budget

City of Brockton

All figures in full dollar amounts			2009 Actual Expenditures	2010 Revised Budget	2011 Department Requested	2011 Mayor Recommended	2011 City Council
<u>Sewer USFContract F.&P. R&M</u>							
60044190	529408	TRTMT R/M	309,068	836,666	890,000	890,000	0
Sewer USFContract F.&P. R&M Total:			309,068	836,666	890,000	890,000	0
<u>SCADA Coordinator</u>							
60044191	531801	SCADA	0	0	0	0	0
SCADA Coordinator Total:			0	0	0	0	0
<u>Sewer Capital Projects R/E</u>							
60044192	589000	CAPTL PROJ	0	0	0	0	0
60044192	589001	BOOSTER	0	0	0	285,500	0
Sewer Capital Projects R/E Total:			0	0	0	285,500	0
<u>Sewer Trtmt Rep/Maint Per K</u>							
60044193	529410	PLT R&M K	300,074	347,015	425,882	425,882	0
Sewer Trtmt Rep/Maint Per K Total:			300,074	347,015	425,882	425,882	0
<u>Capital Projects from R/E</u>							
60044194	589000	CAPTL PROJ	0	0	0	0	0
60044194	589001	BOOSTER	0	0	0	0	0
60044194	589006	RADIOS	0	0	0	0	0
60044194	589007	US FILTER	0	0	0	0	0
60044194	589008	DUMP TRUCK	0	0	0	0	0
60044194	589009	PHASE III	0	0	0	0	0
60044194	589010	PHASE II	0	0	0	0	0
60044194	589011	BKHOE LOAD	-93,000	0	0	91,530	0
60044194	589012	MISC IMPV	0	0	0	100,000	0
60044194	589013	INCIN MOD	0	0	0	0	0
60044194	589014	PLANT UPGR	0	0	0	0	0
60044194	589015	PHASE III	0	0	0	0	0
60044194	589020	SEC ASSMT	0	0	0	0	0
60044194	589021	HOUSE INFL	-97,276	0	0	0	0
60044194	589022	PHASE IV	-50,000	0	0	0	0
60044194	589903	PUMPS	0	0	0	240,000	0
Capital Projects from R/E Total:			-240,276	0	0	431,530	0
<u>Deficits to be raised</u>							
60044195	595900	DEF RAISED	0	174,326	0	0	0
Deficits to be raised Total:			0	174,326	0	0	0

FY 201 Budget

City of Brockton

All figures in full dollar amounts	2009 Actual Expenditures	2010 Revised Budget	2011 Department Requested	2011 Mayor Recommended	2011 City Council
Sewer Personnel Services Ove	120,599	160,000	160,000	158,349	0
Sewer Personnel Services Non	1,034,840	1,357,118	1,311,490	1,226,572	0
Sewer Purchase of Service	1,812,486	2,451,335	2,451,335	2,423,385	0
Sewer Goods &Supplies	189,688	236,212	236,812	222,199	0
Sewer Capital Projects	0	0	0	0	0
Sewer Debt Service	5,835,834	6,759,490	0	5,503,502	0
Sewer Expense Reimbursement	1,176,138	1,471,926	0	1,851,413	0
Sewer Debt Service from R/E	491,822	0	0	1,852,114	0
Consent Decree Penalties	0	0	0	0	0
O.M. Emer Contract Repair	-510,794	200,000	200,000	200,000	0
Sewer-Other Contract Servic	3,182,960	3,365,240	3,326,006	3,326,006	0
US Fil-Wastewater/Filtra Sur	192,347	222,779	225,262	225,262	0
Sewer USFContract F.&P. R&M	309,068	836,666	890,000	890,000	0
SCADA Coordinator	0	0	0	0	0
Sewer Capital Projects R/E	0	0	0	285,500	0
Sewer Trtmt Rep/Maint Per K	300,074	347,015	425,882	425,882	0
Capital Projects from R/E	-240,276	0	0	431,530	0
Deficits to be raised	0	174,326	0	0	0
DEPARTMENT GRAND TOTALS:	13,894,785	17,582,107	9,226,787	19,021,714	0

FY2011 SEWER ENTERPRISE FUND EXPENSE REIMBURSEMENT							FY 2011			
Description	Issue Date	Maturity Date		Rate	# of Years	Original Amount	Pay Dates	Principal	Interest	Total

FY2011 SEWER ENTERPRISE FUND EXPENSE REIMBURSEMENT							FY 2011			
Description	Issue Date	Maturity Date		Rate	# of Years	Original Amount	Pay Dates	Principal	Interest	Total

FY2011 SEWER ENTERPRISE FUND EXPENSE REIMBURSEMENT							FY 2011			
Description	Issue Date	Maturity Date		Rate	# of Years	Original Amount	Pay Dates	Principal	Interest	Total

Issuance costs (Phase III WWTP)	\$	10,000
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Issuance costs (Restructuring CW 05-29)	\$	6,500
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Interest on Interim Loan	\$	10,139
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** - Treasurer's Debt - 50% Cost of Principal & Interest @ 4% on \$11,000,000 borrowing for water meters paid over 10 years \$ 770,000

OTHER COSTS

HEALTH	\$	221,726
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DENTAL	\$	7,131
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PENSION	\$ 300,733
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CENTRAL SERVICE	\$ 337,182
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ADDITIONAL PRIOR/CURRENT YEAR RECAPTURE
0

LIFE INSURANCE	\$	497
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MEDICARE TAXES	\$	14,767
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UNEMPLOYMENT EXPENSES	\$	9,812
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MEDICAL COMPENSATION EXPENSES	\$	14,839
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NONCONTRIBUTORY PENSIONS	\$	-
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COURT JUDGEMENTS	\$	-
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PROPERTY DAMAGE CLAIMS	\$	1,200
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OTHER INSURANCE	\$	39,450
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STABILIZATION FUND - CONTRACT FUNDING	\$	-
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ORDINARY MAINTENANCE	\$	-
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RELEASES	\$	-
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GASB 34 ADMINISTRATION	\$	-
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DPW ADMIN COSTS (30%)	\$	107,437
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TOTAL Debt, Other & Additional	\$ 1,851,413
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CITY OF BROCKTON
SUMMARY OF SEWER DEBT SERVICE
FISCAL YEAR 2011

SEWER DEBT SERVICE PURPOSE	ISSUE DATE	INTEREST RATE	MATURITY DATE	PAYMENT DATES	PRINCIPAL	INTEREST	TOTAL DEBT
SEWER BONDS OSCAR ST./LISA DRIVE (I) (\$1,150,000)	05/01/99	3.80% - 6.00%	05/01/18	11/01/10 05/01/11	60,000.00 60,000.00	10,457.50 10,457.50 20,915.00	10,457.50 70,457.50 80,915.00
HOWARD ST. INTERCEPTOR (I) (MWPAT #94-12 SERIES 2)	06/01/95	4.00% - 5.70%	02/01/15	07/15/10 01/15/11	70,500.00 70,500.00	11,258.67 10,675.83 21,934.50	11,258.67 81,175.83 92,434.50
INFILTRATION / INFLOW (I) (MWPAT #97-06 SERIES 3)	04/29/97	4.50% - 6.00%	02/01/17	07/15/10 01/15/11	73,914.00 73,914.00	15,716.59 15,215.02 30,931.61	15,716.59 89,129.02 104,845.61
NORTH MAIN INTERCEPTOR (I) (MWPAT #97-25 SERIES 4)	12/09/98	4.00% - 5.125%	08/01/18	07/15/10 01/15/11	57,612.00 57,612.00	9,376.93 14,827.88 24,204.81	66,988.93 14,827.88 81,816.81
BOYLE ROAD INTERCEPTOR (I) (MWPAT #97-23 SERIES 4)	12/09/98	4.00% - 5.125%	08/01/18	07/15/10 01/15/11	24,530.00 24,530.00	4,002.04 6,324.59 10,326.63	28,532.04 6,324.59 34,856.63
S.S.E.S. STUDY \$848,696 (I) (MWPAT 98-115 SERIES 5)	10/06/99	4.00% - 5.75%	08/01/19	07/15/10 01/15/11	46,506.06 46,506.06	7,543.93 15,877.37 23,421.30	54,049.99 15,877.37 69,927.36
S.S.E.S. STUDY \$493,811 (I) (MWPAT #99-05 SERIES 6)	11/01/00	4.50% - 5.625%	08/01/20	07/15/10 01/15/11	23,384.37 23,384.37	6,304.25 9,204.47 15,508.72	29,688.62 9,204.47 38,893.09
SEWER (I) (\$2,000,000)	05/01/02	3.00% - 5.00%	06/15/22	12/15/10 06/15/11	100,000.00 100,000.00	28,025.00 28,025.00 56,050.00	28,025.00 128,025.00 156,050.00
REFUNDING BOND 1993 SEWER (O) (\$1,781,493)	05/01/02	3.50% - 4.80%	06/15/18	12/15/10 06/15/11	121,000.00 121,000.00	20,794.40 20,794.40 41,588.80	20,794.40 141,794.40 162,588.80
PH I WWTP & PH III REHAB (O) (MWPAT #03-32 SERIES 10)	11/23/04	2.50% - 5.25%	08/01/24	07/15/10 01/15/11	687,559.00 687,559.00	320,597.70 303,408.73 624,006.43	1,008,156.70 303,408.73 1,311,565.43
PH II WWTP & PH V REHAB (O) (MWPAT # 04-30 SERIES 11)	11/16/05	2.00%	07/15/25	07/15/10 01/15/11	1,133,340.00 1,133,340.00	211,578.13 200,244.73 411,822.86	1,344,918.13 200,244.73 1,545,162.86
REFUNDING - 2000 SEWER (I) (\$429,040)	04/15/05	3.00% - 5.00%	06/01/20	12/01/10 06/01/11	43,875.00 43,875.00	9,535.38 9,535.38 19,070.76	9,535.38 53,410.38 62,945.76
WWTP & PH IV REHAB (O) (MWPAT # 05-29 SERIES 12)	12/14/06	2.00%	07/15/26	07/15/10 01/15/11	1,504,785.72 1,504,785.72	301,644.76 286,596.90 588,241.66	1,806,430.48 286,596.90 2,093,027.38

CITY OF BROCKTON
SUMMARY OF SEWER DEBT SERVICE
FISCAL YEAR 2011

SEWER DEBT SERVICE PURPOSE	ISSUE DATE	INTEREST RATE	MATURITY DATE	PAYMENT DATES	PRINCIPAL	INTEREST	TOTAL DEBT
PH VI SEWER REHAB (MWPAT # 06-35 SERIES 13)	12/18/07	2.00%	07/15/27	07/15/10 01/15/11	113,799.00	24,410.65	138,209.65
						23,272.66	23,272.66
					113,799.00	47,683.31	161,482.31
PH VII SEWER REHAB (MWPAT # 07-35 SERIES 14)	03/18/09	2.00%	07/15/28	07/15/10 01/15/11	94,020.00	21,515.65	115,535.65
						20,575.45	20,575.45
					94,020.00	42,091.10	136,111.10
PHASE III WWTP (MWPAT # 03-32-A SERIES 14)	03/18/09	2.00%	07/15/28	07/15/10 01/15/11	145,153.00	33,216.90	178,369.90
						31,765.37	31,765.37
					145,153.00	64,982.27	210,135.27
RESTRUCTURING CW-05-29 (MWPAT # 05-29-A SERIES 14)	03/18/09	2.00%	07/15/26	07/15/10 01/15/11	113,224.00	22,696.44	135,920.44
						21,564.20	21,564.20
					113,224.00	44,260.64	157,484.64
PHASE IV WWTP (MWPAT # 08-35 SERIES 15)		2.00%	07/15/29	07/15/10 01/15/11	404,406.71	108,757.90	513,164.61
						96,347.84	96,347.84
					404,406.71	205,105.74	609,512.45
TOTALS					4,817,608.86	2,292,146.14	7,109,755.00

CITY OF BROCKTON
SUMMARY OF DEBT SERVICE - ISSUANCE COSTS

FISCAL YEAR 2011

SEWER		
ADMINISTRATIVE FEES	08/01/10	296.28
HOWARD ST INTERCEPTOR	02/01/11	296.28
(MWPAT #94-12 SERIES 2)		<u>592.56</u>
ADMINISTRATIVE FEES	08/01/10	424.17
INFILTRATION/INFLOW PHASE 1	02/01/11	424.17
(MWPAT #97-06 SERIES 3)		<u>848.34</u>
ADMINISTRATIVE FEES	08/01/10	411.16
N. MAIN INTERCEPTOR	02/01/11	367.95
(MWPAT #97-25 SERIES 4)		<u>779.11</u>
ADMINISTRATIVE FEES	08/01/10	175.37
BOYLE ROAD	02/01/11	156.98
(MWPAT #97-23 SERIES 4)		<u>332.35</u>
ADMINISTRATIVE FEES	08/01/10	390.65
S.S.E.S. STUDY \$848,696	02/01/11	355.77
(MWPAT 98-115 SERIES 5)		<u>746.42</u>
ADMINISTRATIVE FEES	08/01/10	223.76
S.S.E.S. STUDY \$493,811	02/01/11	206.22
(MWPAT #99-05 SERIES 6)		<u>429.98</u>
ADMINISTRATIVE FEES	08/01/10	10,022.51
PH I WWTP & PH III REHAB	02/01/11	9,506.85
(MWPAT #03-32 SERIES 10)		<u>19,529.36</u>
ADMINISTRATIVE FEES	08/01/10	15,868.36
PH II WWTP & PH V REHAB	02/01/11	15,018.35
(MWPAT # 04-30 SERIES 11)		<u>30,886.71</u>
ADMINISTRATIVE FEES	08/01/10	22,623.36
PH III WWTP & PH IV REHAB (O)	02/01/11	21,494.77
(MWPAT # 05-29 SERIES 12)		<u>44,118.13</u>

CITY OF BROCKTON
SUMMARY OF DEBT SERVICE - ISSUANCE COSTS

FISCAL YEAR 2011

SEWER		
ADMINISTRATIVE FEES	08/01/10	1,830.80
PH VI SEWER REHAB	02/01/11	1,745.45
(MWPAT # 06-35 SERIES 13)		<u>3,576.25</u>
ADMINISTRATIVE FEES	08/01/10	1,613.67
PH VII SEWER REHAB	02/01/11	1,543.16
(MWPAT # 07-35 SERIES 14)		<u>3,156.83</u>
ADMINISTRATIVE FEES	08/01/10	2,491.27
PHASE III WWTP	02/01/11	2,382.40
(MWPAT # 03-32-A SERIES 14)		<u>4,873.67</u>
ADMINISTRATIVE FEES	08/01/10	1,702.23
RESTRUCTURING CW-05-29	02/01/11	1,617.32
(MWPAT # 05-29-A SERIES 14)		<u>3,319.55</u>
ADMINISTRATIVE FEES	08/01/10	7,529.39
PHASE IV WWTP	02/01/11	7,226.09
(MWPAT # 08-35 SERIES 15)		<u></u>
ORIGINATION FEE	08/01/10	75,293.93
PHASE IV WWTP		<u>75,293.93</u>
(MWPAT # 08-35 SERIES 15)		<u></u>
SEWER TOTALS		<u>195,860.93</u>

POTENTIAL NEW ISSUES - ISSUANCE COSTS

SEWER		
ISSUANCE COSTS		25,000.00
MWPAT		
TOTAL SEWER ISSUANCE COSTS		<u>220,860.93</u>

CITY OF BROCKTON
SUMMARY OF DEBT SERVICE - ISSUANCE COSTS

FISCAL YEAR 2011

POTENTIAL NEW ISSUES - INTEREST SHORT TERM NOTES

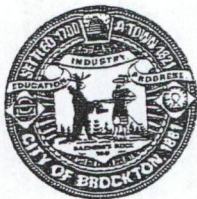
SEWER

INTEREST INTERIM LOANS	25,000.00
MWPAT	

ISSUANCE COSTS PAID BY GEN FUND TO BE REIMBURSED BY THE SEWER ENT FUND

EDWARDS ANGELL PALMER & DODGE PHASE III WWTP (MWPAT # 03-32-A SERIES 14)	03/18/09	10,000.00
EDWARDS ANGELL PALMER & DODGE RESTRUCTURING CW-05-29 (MWPAT # 05-35 SERIES 14)	03/18/09	6,500.00

TOTAL TO BE REIMBURSED	<u>16,500.00</u>
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"City of Champions"

DEPARTMENT OF PUBLIC WORKS
OFFICE OF THE COMMISSIONER

May 27, 2010

Michael L. Thoreson
COMMISSIONER

CERTIFIED MAIL 7002 2410 0001 8493 8421

I. Andrew Goldberg
Assistant Attorney General
Massachusetts Office of the Attorney General
One Ashburton Place
18th Floor
Boston, MA 02108

Subject: Brockton, Massachusetts
Wastewater Collection/Treatment Facility
Consent Decree Civil Action Case No. 1:06-cv-11334-NMG
Lead Analysis SEP - Completion Report

Dear Mr. Goldberg:

The following is the Completion Report for the Supplemental Environmental Project (SEP) as noted in Appendix C of the subject Consent Decree, titled: "Pilot Program for Collection of Drinking Water Samples at the City of Brockton Schools and Child Care (daycare and nursery) Facilities in City Buildings for Analysis of Lead" (lead SEP). This information is provided in accordance with Section 15 of the Consent Decree.

Section 15 a - Detailed Description of the SEP as Implemented:

Background and Schedule:

The basic requirements of the lead SEP as noted in the subject Consent Decree are shown in the attached Exhibit A. The City submitted a draft scope of work to the Massachusetts Department of Environmental Protection (MADEP) and the US Environmental Protection Agency (EPA) in December of 2007. Following multiple rounds of revision and subsequent review, the scope was approved by MADEP/EPA in September 2008, and is included in Exhibit B. The City performed a survey of all schools from June to August of 2008, to confirm the number of fixtures in finalizing the scope of work. The first draw samples were taken in all identified school fixtures from September 26, 2008 through November 15, 2008. Retests for schools above the action level were taken from March 28, 2009 through April 28, 2009. Retests of first draw and flush draw samples were then taken from August 7, 2009 through October 13, 2009. Preliminary test results were shared with the Brockton School Department, and any sites over the action level were immediately identified for corrective actions. Additional coordination and corrective action was performed from December 2009 through May 2010.

Lead content in drinking water is generally caused by either distribution system pipes or from building plumbing due to lead pipes or lead solder. The City of Brockton has been treating its water with some form of polyphosphate since 1992. Aquamag 9600 is currently used, and there have been no lead problems over the last 3 years. According to internal records research, the City has never used lead pipes, but did use lead corporations (connecting units from the mains to the building service pipe) dating to approximately 1974. The City also has not allowed the use of lead service pipes, indicating that most positive lead levels are likely caused by building plumbing, especially that plumbing installed prior to 1986 when the use of lead solder was precluded by EPA.

Extended retention time of water in pipes allows the metals, including lead from solder, to be absorbed into the water. This may also contribute to the positive results experienced during this testing of all the Brockton Schools.

Summary of Testing Results:

The First Round of sampling was for "First Draw" testing. Flushing was generally performed by the custodial staff of each school, following coordination of the Utilities Department and School Department. One exception to this rule was the YMCA daycare centers, which were flushed by the City's Water Systems Manager. The following Table 1 is a summary of First Draw Results, with a complete listing of all results included in Exhibit C - First Draw Results.

Table 1 - First Draw Sampling Results

School Name	School ID Code	Total Number of Samples	Total Number of Passed Samples	Total Number of Elevated Samples
PRIORITY 1		DW +PDW+NDW		
Old Colony Y Youth Division- Day Care	YYD	4	4	0
Old Colony Y West Chestnut - Day Care	YWC	14	14	0
Old Colony Y Pleasant St - Day Care	YPL	12	12	0
Old Colony Y Main Division- Day Care	YMB	1	1	0
Boys and Girls Club -Day Care	BGD	18	18	0
TOTAL 1		49	49	0
PRIORITY 2				
Davis School	DAV	121	105	16
Huntington School	HUN	39	39	0
J P Downey School	DOW	114	98	16
Keith School	KEI	47	45	2
Whitman School	WHI	10	10	0
Brookfield School	BRO	67	65	2
Hancock School	HAN	67	42	25

Howard School	HOW	25	13	12
J F Kennedy School	JFK	56	50	6
Raymond School	RAY	58	53	5
TOTAL 2		604	522	82
PRIORITY 3				
Angelo School	ANG	120	108	12
Arnone School	ARN	98	97	1
Plouffe School	PLO	100	96	4
Lincoln / Ithaca School	LIN	25	15	10
BB Russell School	BBR	22	19	3
East Jr. High	EJH	37	33	4
North Jr. High	NJH	42	24	18
South Jr. High	SJH	43	42	1
West Jr. High	WJH	33	26	7
Gilmore Academy	GIL	55	54	1
TOTAL 3		575	514	61
Priority 4				
Goddard School - Champion Charter	GOD	26	21	5
Brockton High School	BHR	380	225	155
TOTAL 4		406	246	160
Totals		1,634	1,331	305

Based on the results in Table 1, it was assumed that flushing performed the night before samples were taken may have been inconsistent, as some schools tested well while others with a high number of faucets (especially laboratory sinks) had very high numbers over the action level. In order to ensure proper flushing was performed in a consistent manner, Utilities Department crews visited the sites the afternoon prior to retesting, which was performed for all 305 sites above the action level.

During the Retest Sampling, both a First Draw and a Flush sample were taken, allowing 30 seconds between each sample. With 305 sites to test in the Retest Sampling group, the initial First Draw sample for each site was taken to the lab on the day it was taken. The Flush Samples were then held in the Utilities Department office. Table 2 summarizes the results of the retest sampling, and detailed sampling results are included in Exhibit D - Retest First Draw Results.

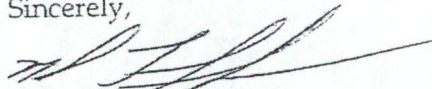
Section 73 - Certification by representative of the City:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Closing

We trust this information meets your expectations regarding the Completion Report for the Lead Analysis SEP. Please do not hesitate to contact me at 508-580-7135 regarding any questions or comments on this information.

Sincerely,



Michael L. Thoreson
DPW Commissioner
MLT/ss

Attachments: Appendices A - F (Bound Separately)

cc: Chief, Environmental Enforcement Section
Environmental and Natural Resources Division
United States Department of Justice
P.O. Box 7611, Ben Franklin Station
Washington, D.C. 20044

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Lawrence Rowley, Utilities Superintendent
Gregory Roy, CDM Cambridge
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June 11, 2010

I. Andrew Goldberg
Assistant Attorney General
Massachusetts Office of the Attorney General
One Ashburton Place
18th Floor
Boston, MA 02108

Subject: Brockton, Massachusetts
Wastewater Collection/Treatment Facility
Consent Decree Civil Action Case No. 1:06-cv-11334-NMG

**Supplemental Environmental Project:
Comprehensive Receiving Water Assessment - REVISED SCOPE OF WORK**

Dear Mr. Goldberg:

The City of Brockton is submitting this revised Scope of Work in compliance with the subject Consent Decree requirement for the Supplemental Environmental Project (SEP):
"Comprehensive Receiving Water Assessment (the Assessment)."

Appendix A of the Consent Decree stipulates that the City shall submit for approval to EPA and Mass DEP a draft Scope of Services for the Assessment, including a schedule for completion of the Assessment and identification of the consultant the City intends to use to conduct the Assessment. The draft scope of work was submitted under cover letter dated February 26, 2009. At the time it was agreed by the interested parties that streamflows were too high to implement the program, so stream sampling would be scheduled for 2010 and 2011 to meet the reporting milestone indicated in the Consent Decree. The updated chemical and biological sampling programs, scheduling details, and cost considerations were described in a cover letter submitted on May 28, 2010. A conference call was held June 7, 2010 to discuss the updated sampling program and come to agreement on any required revisions. Stakeholders participating in the call were representatives of EPA, MADEP, City of Brockton, CDM, and Mr. Tim Watts. The parties agreed to final sampling locations, and agreed upon the types and number of tests to be performed at each location to provide the most useful information within the required budget of \$80,000. The revised scope of work is described in more detail below and in the attachments provided.

In conjunction with this revised scope of work, a Quality Assurance Project Plan (QAPP) has been developed and submitted for the SEP work. Revision and approval of the QAPP is ongoing, and shall be required prior to commencement of this scope of work.

Sampling Program Goals:

Chemical and biological sampling will be performed to provide data suitable for use by MADEP to support an Aquatic Life Use status assessment. Within the \$80,000 upper limit budget constraint imposed by the Consent Decree, appropriate analytes, analyses, and sampling locations have been selected in conjunction with MADEP and EPA, to help assess improvements to water quality that may have resulted from recent upgrades at the Brockton AWRF. Sampling will occur if flows are at or below August median low flows. One round of sampling is scheduled for August 2010, and one round is scheduled for August 2011; however, sampling may occur in the months of July or September if the low flow criteria are reached. All sample collection and data submittals will be as outlined in MADEP guidance CN#0.71 Guidelines for Submittal of Data for potential use in DWM's Waterbody Assessments and TMDLs (Clean Water Act, Sections 305(b) and 303(d)).

Quality Assurance Project Plan (QAPP)

Sampling will be performed following MADEP and EPA approval of a QAPP. The QAPP addresses field sampling and analysis of water quality parameters as needed, including biological surveys. The University of Massachusetts Dartmouth's Coastal Systems Program Analytical Facility at the School of Marine Science and Technology (SMAST), or other laboratory contracted to perform analyses will provide all laboratory standard operating procedures (SOPs) and electronic Quality Assurance Plans (QAPs), and relevant reporting limits and method detection limit information, select appropriate sample containers, identify field preservation procedures, and will provide tabulated data results.

The draft QAPP and Sampling and Analysis Plan was previously submitted with the draft scope of work for review and approval. The QAPP provides additional detail on the project (i.e., who, what, when, where, why, and how data collection will occur.) Project sampling will include appropriate field and laboratory quality control samples at a rate of at least 10% (1 quality control sample per 10 field samples) to assess general data quality issues, as detailed in the project QAPP.

Project reporting will include raw data, QC data, and important metadata. All project data, metadata, and quality control data will be critically reviewed to look for problems that may compromise data usability. The draft QAPP was provided with the previous submission.

Sampling Locations:

In accordance with the requirements of the SEP, the attached map figure identifies the proposed ten sampling locations, from upstream of the Brockton Advanced Water Reclamation Facility (AWRF) to the confluence of the Matfield and Town Rivers. The attached table provides additional detail for each location, including watercourse identification, whether or not the location was included in previous DEP sampling/ testing programs, sampling location and

access information, the nearest confluence of the river system, and which testing procedures will be performed in each of the two years. As noted in the table, seven of the ten locations proposed were included in previous chemical and biological testing by the MA DEP Division of Watershed Management (DWM) as detailed in the report 2006 DWM Environmental Monitoring Overview (CN277.0), although data from this sampling has not yet become available.

Specific monitoring sites within the watercourse at these locations will be selected in advance of sampling, targeting wadeable (i.e., <2-3 feet low-flow depth) stream sections that might have riffle, run, and pool components and a relatively intact riparian buffer with a tree canopy. Ideally, for biological surveys, the substrate would be a mix of sand, gravel, and cobble with some accumulations of coarse woody debris and finer detritus. Monitoring sites must also be accessible and will be located near road crossings or other access points.

Chemical Sampling Program:

The chemical sampling program will include field sampling and lab testing for dissolved oxygen levels, pH, turbidity, specific conductance, nitrogen series (nitrate+nitrite, ammonium, and dissolved organic N), chlorophyll A, total phosphorous, and dissolved organic phosphorous. Per the June 7th conference call, analysis for total hardness, alkalinity, total dissolved solids, and total suspended solids will not be performed in order to help meet the program budget requirements. Samples will be taken at each of the ten sampling locations for each of the noted chemical tests, and transported to a testing lab. The University of Massachusetts - Dartmouth School of Marine Science And Technology (SMAST) Coastal Systems Program, Analytical Facility Laboratory or a similar facility will be utilized to perform the lab testing for all water samples under this program. CDM will coordinate the program, collect and deliver the samples, and review and report results. Each round of the chemical sampling will include confirmation of sampling locations, compilation of precipitation data, and approximately one day of field work for two, 2-person teams, compilation of all testing results, and a "Field Completion Memo" summarizing the procedures and results.

Biological Sampling Program:

As confirmed in the June 7th conference call, the biological sampling program will include macroinvertebrate surveys and habitat assessments at six sampling locations (using USEPA rapid bio-monitoring/bio-assessment protocol, or RBP III) for year one only. Field work will be performed by Biodiversity of Amherst, MA, and CDM will perform macroinvertebrate analysis. Periphyton assessment (analysis of micro algae, bacteria, and/or fungi on submerged substrates) and macrophyte analysis (qualitative analysis of vegetation at the sampling site, such as water starwort, waterwort, and pondweed) will be performed at six sites for both years one and two, and will also be performed by Biodiversity. The periphyton analysis shall include an assessment of percent coverage without taxonomic identification. Fish survey shall

be performed in year one only for not fewer than three locations and not more than six locations. This three person team will consist of Biodiversity and CDM personnel.

CDM will coordinate the overall program, perform or assist with the field work as noted, perform macroinvertebrate classifications (i.e., identification to family/genus), and review and report results. It is estimated that each biological survey round will include confirmation of the in-stream sampling locations, compilation of precipitation data, approximately three days of field work by two- and three-person teams to perform the biological and fish sampling concurrently, in-house lab work for identification to family/genus, compilation of all sampling and outside analysis, and a "Field Completion Memo" summarizing the procedures and results. Data submittals will be prepared according to MADEP guidance CN#0.71 Guidelines for Submittal of Data for potential use in DWM's Waterbody Assessments and TMDLs (Clean Water Act, Sections 305(b) and 303(d)).

Proposed Schedule:

One round of sampling is scheduled for 2010, and one round is scheduled for 2011.

To comply with the requirement to sample during "low flow" conditions, sampling will be targeted for August of each sampling year; however, sampling may occur in the months of July to September in appropriate low-flow conditions. Precipitation levels (via NOAA) and the USGS stream gage level on the Taunton River will be monitored prior to each year's sampling program, and will be documented for the five days prior to sampling. Following completion of the sampling program and field completion memos, the SEP Completion Report shall be submitted by March 31, 2012, as stipulated in the SEP.

Cost Considerations:

The SEP includes a requirement that the City shall expend a total of no more than \$80,000 toward the cost of the Assessment. Further, the City will include documentation of the expenditures made in connection with the Assessment as part of the SEP Completion Report, which will be submitted by March 31, 2012. The City currently submits quarterly reports detailing work completed in accordance with the requirements of the Consent Decree, including expenditures towards completion of the individual SEPs.

It has been acknowledged by EPA that to complete the full suite of chemical and biological sampling programs at all ten locations, plus all reporting, would require significantly more than the \$80,000 upper limit. The revised scope detailed herein is estimated to cost \$83,000, and represents the agreed-upon scope as discussed in the June 7th conference call with the noted stakeholders. Costs will be tracked on a monthly basis, and possible adjustments to scope may be identified following completion of the first round of sampling to ensure cost requirements are met. Any requested revisions to this scope will be forwarded for review and approval to the stakeholders referenced in this letter prior to implementation.

Certification by Representative of the City:

In accordance with Section 73 of the Consent Decree, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Closing

We trust this information meets your expectations regarding the required scope of work for the Comprehensive Receiving Water Assessment SEP.

Please do not hesitate to contact me at 508-580-7135 regarding any questions or comments on this information.

Sincerely,

Michael L. Thoreson
DPW Commissioner

cc: Chief, Environmental Enforcement Section
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